

**EXHIBIT 13**

**Zwillinger, Zachary S.**

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**From:** Hamerman, Natan <NHamerman@KRAMERLEVIN.com>  
**Sent:** Sunday, June 2, 2019 4:06 PM  
**To:** Worthington, James B.; Bassett, Nicholas; Despins, Luc A.; Jimenez, Pedro; Zwillinger, Zachary S.; rolando@bufete-emmanuelli.com; Jessica@bufete-emmanuelli.com; notificaciones@bufete-emmanuelli.com  
**Cc:** Mayer, Thomas Moers; Caton, Amy; Horowitz, Gregory; Byowitz, Alice J.; Cohen, Michael  
**Subject:** [EXT] RE: PREPA Rule 9019 Motion Discovery

Jay,

As discussed on Friday afternoon, we still consider this proposal to be substantially overbroad, unduly burdensome, and otherwise inappropriate and objectionable in several respects. That said, we are continuing to explore whether there are any places we can narrow the gap, but we do not expect to be able to get back to you on that today. Instead, we may reach out during the week.

Regards,  
Natan

Natan Hamerman

Counsel

Kramer Levin Naftalis & Frankel LLP  
1177 Avenue of the Americas, New York, New York 10036  
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**From:** Worthington, James B. [mailto:jamesworthington@paulhastings.com]  
**Sent:** Friday, May 31, 2019 2:54 PM  
**To:** Hamerman, Natan; Bassett, Nicholas; Despins, Luc A.; Jimenez, Pedro; Zwillinger, Zachary S.; rolando@bufete-emmanuelli.com; Jessica@bufete-emmanuelli.com; notificaciones@bufete-emmanuelli.com  
**Cc:** Mayer, Thomas Moers; Caton, Amy; Horowitz, Gregory; Byowitz, Alice J.; Cohen, Michael  
**Subject:** [EXTERNAL] RE: PREPA Rule 9019 Motion Discovery

Natan,

In advance of our follow-up call today, we propose the following scope of discovery from Kramer Levin's AHG clients:

- From each of the three funds with the largest PREPA holdings:

- o (1) The fund will identify the team with primary responsibility for negotiations relating to the PREPA settlement, and from the members of that team, produce all communications relating to (a) the RSA, Preliminary RSA, or the Settlement, with respect to each including all negotiations, prior versions and drafts thereto, and (b) such fund's collateral position (i.e., discussion concerning whether such position is/was undersecured, oversecured, any changes in value, etc) including all emails, texts, instant messages, WhatsApp messages, etc.
- o (2) The fund will produce documents relating to its PREPA positions maintained in the ordinary course of business from January 1, 2018 to the present by its credit committee (or similar body, even if differently titled – the purpose of this request is to capture the documents maintained by the fund in the ordinary course of its monitoring and oversight of its credit positions)

Best regards,  
Jay

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**From:** Hamerman, Natan <NHamerman@KRAMERLEVIN.com>

**Sent:** Wednesday, May 29, 2019 8:14 PM

**To:** Bassett, Nicholas <nicholasbassett@paulhastings.com>; Despins, Luc A. <lucdespins@paulhastings.com>; Jimenez, Pedro <pedrojimenez@paulhastings.com>; Worthington, James B. <jamesworthington@paulhastings.com>; Zwillinger, Zachary S. <zacharyzwillinger@paulhastings.com>; rolando@bufete-emmanuelli.com; Jessica@bufete-emmanuelli.com; notificaciones@bufete-emmanuelli.com

**Cc:** Mayer, Thomas Moers <TMayer@KRAMERLEVIN.com>; Caton, Amy <ACaton@KRAMERLEVIN.com>; Horowitz, Gregory <GHorowitz@KRAMERLEVIN.com>; Byowitz, Alice J. <ABowitz@KRAMERLEVIN.com>; Cohen, Michael <MCohen@KRAMERLEVIN.com>

**Subject:** [EXT] PREPA Rule 9019 Motion Discovery

Attached please find responses and objections to the discovery requests served on the Ad Hoc Group of PREPA Bondholders and certain of its members.

An initial document production will follow by FTP transfer. (You will receive a link from which you can download the documents.) The document production is bates labeled AHG-0001-4292. The production is being made on behalf of the Ad Hoc Group, together with all of its members and professionals who were asked to produce documents.

Regards,  
Natan

Natan Hamerman  
Counsel

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